Case 1:21-cr-00225-MKV Document 207 Filed 10/04/23 Page 1 of 1

Federal Defenders OF NEW YORK, INC.

Southern District 52 Duane Street-10th Floor, New York, NY 10007 Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton
Executive Director

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

October 4, 2023

USDC SDNY DOCUMENT ELECTRONICALLY FILED

DOC #:

DATE FILED: 10/4/2023

BY ECF

Honorable Mary Kay Vyskocil United States District Judge Southern District of New York 500 Pearl Street New York, NY 10007

Re: United States v. Massiel Encarnacion-Velez,

21 Cr. 225 (MKV)

Dear Judge Vyskocil:

I write with the consent of the government to request that the Court again adjourn by 90 days Ms. Encarnacion-Velez's voluntary surrender date, which is currently set for on or about October 24, 2023. The requested adjournment is necessary for the care of Ms. Encarnacion-Velez's baby daughter because (1) she continues to nurse at this time and (2) Fulvio Valdez, Ms. Encarnacion-Velez's partner and her daughter's father, is still in physical therapy for his injuries due to a car-on-motorcycle accident that put him in the hospital earlier this year.

As noted, the government consents to this request.

Respectfully submitted,

<u>/s/</u>

Clay H. Kaminsky Assistant Federal Defender (212) 417-8749 / (646) 842-2622 clay_kaminsky@fd.org

CC: AUSA Matthew Shahabian

Granted. SO ORDERED.

Date: 10/4/2023

New York, New York

Mary Kay Wskocil nited States District Judge